

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**-vs-**

**Case # 19-13558**

**HON. STEPHEN MURPHY**

**\$19,607.44 U.S. Currency in Comerica  
Bank Account No. 6825289306 in the  
names of Ronald and Mary Kufner; and**

**\$30,959.44 U.S. Currency in Comerica  
Bank Account No. 6825289462 in the  
names of Ronald and Mary Kufner.**

**Defendants.**

\_\_\_\_\_ /

**ANSWER TO COMPLAINT  
FOR FORFEITURE**

Now comes Claimant Mary Kufner, by and through her lawyer Steven Fishman, and answers the government's complaint for forfeiture as follows:

1. Claimant neither admits nor denies paragraphs 1-3 and leaves the government to its proofs.
2. Claimant admits paragraphs 4-10.
3. Claimant admits that paragraphs 11-21 set forth the relevant statutes.
4. Claimant admits paragraphs 22-34.
5. Claimant neither admits nor denies paragraphs 35-38, and leaves the government to its proofs.
6. Claimant admits paragraphs 39-40.

7. Claimant neither admits nor denies the allegations in paragraphs 41-105 and leaves the government to its proofs.

8. Claimant neither admits nor denies the allegations in paragraph 106 and leaves the government to its proofs. However, Claimant notes that Dr. Ronald Kufner left The Pain Center (TPC) in October, 2017 and was gainfully employed elsewhere for thirteen months before the money in this account was seized for forfeiture on December 6, 2018.

9. Claimant neither admits nor denies the allegations in paragraphs 107-128 and leaves the government to its proofs.

10. Claimant neither admits nor denies the allegations in paragraph 129 and leaves the government to its proofs. However, Claimant again notes that Dr. Ronald Kufner left TPC in October, 2017 and was gainfully employed elsewhere for thirteen months before this account was seized for forfeiture on December 6, 2018.

11. Claimant neither admits nor denies the allegations in paragraphs 130-152 and leaves the government to its proofs.

### **AFFIRMATIVE DEFENSE**

Pursuant to 18 USC §983(d), Claimant asserts that she is an “innocent owner” as defined in the statute.

### **DEMAND FOR JURY TRIAL**

Claimant requests a trial by jury in this matter.

**RELIEF REQUESTED**

Wherefore, Claimant Mary Kufner requests that: (a) she be found to be an innocent owner pursuant to 18 USC § 983(d); and (b) that the funds in the two relevant accounts be returned to her.

Respectfully submitted,

s/ Steven Fishman  
Steven Fishman (P23049)  
Attorney for Defendant  
615 Griswold, Suite #1120  
Detroit, MI 48226  
(313) 920-2001  
e-mail: [sfish66@yahoo.com](mailto:sfish66@yahoo.com)

Dated: July 26, 2022

